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U.S. DISTRICT COURT  
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DISTRICT OF UTAH  
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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

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UNITED STATES OF AMERICA,	:	Case: 1:19-cr-00111
	:	Assigned To : Shelby, Robert J.
	:	Assign. Date : 11/6/2019
Plaintiff,	:	Description:
	:	
v.	:	INDICTMENT
	:	
NIKOLAS BENNION BRADSHAW,	:	
	:	Vio. 18 U.S.C. § 2252A(a)(5)(B) and
Defendant.	:	(b)(2) (Possession of Child Pornography)
	:	
	:	

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The Grand Jury charges:

**Count 1**  
**18 U.S.C. § 2252A(a)(5)(B) and (b)(2)**  
**(Possession of Child Pornography)**

Beginning on a date unknown and continuing through on or about September 5,  
2019, in the Northern Division of the District of Utah,

**NIKOLAS BENNION BRADSHAW,**

defendant herein, knowingly possessed any material which contained an image of child pornography, involving a minor who had not attained 12 years of age, as defined in 18 U.S.C. § 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, including by computer, and attempted to do so; all in violation of 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2).

**NOTICE OF INTENT TO SEEK FORFEITURE**

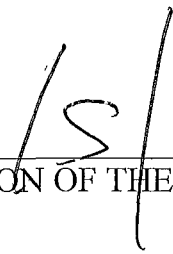
The United States of America seeks forfeiture of the following property:

- Black and Red computer tower;
- Mac Laptop Model A1990;
- iPad in Pink Case Model A1599;
- Amazon Kindle;
- Pink iPhone 7;
- Black duffle bag containing computer components; and
- Substitute property as allowed by 21 U.S.C. § 853(p) and 18 U.S.C. § 2253(b).

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense alleged herein in violation of 18 U.S.C. § 2252A, the above-named defendant shall forfeit to the United States, (i) any visual depiction described in 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of this chapter; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (iii) any


property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

A TRUE BILL:

  
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FOREPERSON OF THE GRAND JURY

APPROVED:

JOHN W. HUBER  
United States Attorney

  
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MARK Y. HIRATA  
Assistant United States Attorney